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7 The Honorable Ricardo S. Martinez
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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

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WASHINGTON STATE ASSOCIATION OF HEAD
START AND EARLY CHILDHOOD ASSISTANCE AND
EDUCATION PROGRAM, ILLINOIS HEAD START
ASSOCIATION, PENNSYLVANIA HEAD START
ASSOCIATION, WISCONSIN HEAD START
ASSOCIATION, FAMILY FORWARD OREGON, and
PARENT VOICES OAKLAND,

v.
Plaintiffs,

ROBERT F. KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services; U.S.
DEPARTMENT OF HEALTH AND HUMAN SERVICES;
ANDREW GRADISON, in his official capacity as Acting
Assistant Secretary of the Administration for Children and
Families; ADMINISTRATION FOR CHILDREN AND
FAMILIES; OFFICE OF HEAD START; and TALA
HOOBAN, in her official capacity as Acting Director of
the Office of Head Start,

Defendants.

Case No. 2:25-cv-00781-RSM

**DECLARATION OF
CANDICE WILLIAMS
(FORMERLY VICKERS) IN
SUPPORT OF PLAINTIFFS'
MOTION FOR
TEMPORARY
RESTRAINING ORDER/TO
POSTPONE EFFECTIVE
DATE OF AGENCY
ACTION**

NOTE ON MOTION
CALENDAR: July 21, 2025

1 I, Candice Williams, hereby declare and state as follows:

2 1. I am over eighteen years old, and I have personal knowledge of the facts set
 3 forth in this Declaration. I could and would testify competently to those facts if called as a
 4 witness in this case.¹

5 **I. Family Forward Oregon's Mission, Activities, and Membership**

6 2. My name is Candice Williams (formerly Vickers), and I am the Executive
 7 Director of Family Forward Oregon ("FFO"). I have served as the Executive Director since
 8 2023. Prior to serving as FFO's Executive Director, I advocated for and served children and
 9 families who have been historically marginalized and systemically denied opportunities to
 10 thrive in the education system for over 15 years.

11 3. In addition to my professional background working as an educator, I am a Black
 12 mother of two children and have personal knowledge of and experience with early education
 13 and supports for young children.

14 4. FFO is a statewide non-profit, non-partisan, community-based organization led
 15 by and comprised of Oregon mothers and caregivers fighting for gender, economic, and racial
 16 justice, and for access to high-quality, affordable, and culturally relevant early childhood
 17 education and childcare. FFO's membership is comprised of Oregon mothers and caregivers
 18 across intersecting identities of race, class, sexuality, gender identity, immigration status,
 19 language, and disability, including parents and family members of children currently enrolled
 20 in Head Start programs. FFO's membership also includes Oregon early childhood educators
 21 and childcare providers, including current Head Start teachers and staff members.

22 5. The mission of FFO is to work collectively with Oregon mothers, caregivers,
 23 and educators to organize, educate, and advocate for care systems that ensure that families

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 26 ¹ I hereby incorporate by reference my Declaration in Support of Plaintiffs' Motion for Preliminary
 27 Injunction, filed on May 16, 2025.

1 obtain economic stability and power, that children and families have access to early childhood
2 education and learning, and where the labor of caregiving is seen and valued. To achieve these
3 goals, FFO builds on the collective power of Oregon mothers, caregivers, and educators
4 through community organizing, leadership development, civic engagement, education, and
5 advocacy. FFO offers many opportunities for training, development, and participation to its
6 members, including, but not limited to, monthly action team meetings; direct actions, including
7 an annual Day Without Child Care to draw attention to the childcare crisis; care summits aimed
8 at engaging and mobilizing members around early education, childcare and other issues; and a
9 statewide parent cohort, comprised of parent members from communities most impacted by
10 the childcare crisis in Oregon.

11 6. Diversity, equity, inclusion, and accessibility, including for immigrant children,
12 parents, and families in Oregon, are central to our work and to our membership. FFO believes
13 that solutions related to early childhood education and the childcare system must actually work
14 and be accessible to everyone, including those who are the most vulnerable and underserved.
15 FFO believes that, when we find solutions that are based on equity and dignity for those in our
16 communities most impacted by harmful conditions, we create benefits and equity for all of us.

17 7. FFO co-leads the Child Care for Oregon coalition of nonprofit organizations,
18 labor unions, community advocates, parents, caregivers, and providers working to build a
19 universal and publicly-funded childcare system that is community-led, equitable, affordable,
20 culturally relevant, inclusive, developmentally appropriate, and safe, and that supports every
21 child's early education, learning, and development. The coalition represents constituencies that
22 are disproportionately impacted by Oregon's disconnected and under-resourced childcare
23 system, including women, parents, and childcare providers who are Black, Indigenous, Asian,
24 refugees, immigrants, Latinx, rural area residents, and/or low-income.

25 8. Through the Child Care for Oregon coalition, FFO and its partner organizations
26 provide opportunities for parents, childcare providers, and community members to ensure that
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1 their perspectives are included in campaigns fighting for increased access to and funding for
 2 early education and childcare, including through story-telling efforts, direct actions, advocacy,
 3 and an activist summit for parents, providers, and community members to share their lived
 4 experiences and build advocacy skills.

5 9. FFO also has a sister organization, known as Family Forward Action, which
 6 works with mothers and caregivers to advocate for stronger statewide programs and laws to
 7 support the economic well-being and power of Oregon families.

8 10. FFO maintains an organizational structure designed to center the voices of
 9 Oregon mothers and caregivers, and particularly those who have been most impacted by racial,
 10 gender, and class disparities in care systems, in its internal decision-making processes. This
 11 structure is designed to ensure that the lived experiences of parents and caregivers, particularly
 12 those from vulnerable and marginalized backgrounds, guide FFO's priorities and strategic
 13 decisions. FFO's Board of Directors also is comprised of parents, caregivers, and community
 14 members who represent the communities that FFO serves.

15 11. FFO engages with over 15,000 individuals through its listserv and other means
 16 of participation, including mothers and caregivers, childcare providers, and other community
 17 members who are dedicated to increasing access to early education and childcare in Oregon.

18 12. Roughly half of our members self-identify as immigrants and/or as having
 19 mixed-status households.² FFO's immigrant members include parents and caregivers of
 20 children who are currently enrolled in and rely on early education and childcare services
 21 provided by Head Start programs in Oregon.

22 13. Many of FFO's immigrant members have limited English proficiency, including
 23 monolingual Spanish speakers. To support these members, FFO has a bilingual

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 26 27 ² The term "mixed-status households" refer to households that are comprised of members who
 are U.S. citizens and members who are non-U.S. citizens.

1 Spanish/English organizing program to engage and educate these members on how the
2 government works, particularly related to access to childcare and early education services. FFO
3 also employs a Bilingual Statewide Organizer to support these members and ensure that they
4 can participate in FFO's summits, monthly action team meetings, and other efforts, and to
5 assist them with enrolling in and/or navigating Head Start and other early education and
6 childcare programs.

7 14. FFO also coordinates two action groups made up mostly of immigrants and
8 members of mixed-status families. These groups support parent engagement, empowerment,
9 and skills-building through programs and activities, such as leadership development trainings,
10 civic education, and distribution of information and resources.

11 15. FFO provides translation services at many of its meetings, trainings, and
12 programs to ensure that its immigrant members, including those who have limited English
13 proficiency, are able to participate fully. In addition, FFO provides its members with translated
14 written materials and information at meetings and activities, as well as on its website.

15 16. FFO hosts other types of activities and programs to support its parent and
16 caregiver members. In 2025, for example, FFO organized a care summit to provide leadership
17 development and engagement opportunities for its parent, caregiver, and educator members of
18 diverse backgrounds and experiences. Of over 60 members who attended the care summit, 75
19 percent identified as Black, Indigenous, or other people of color; more than 50 percent
20 identified as monolingual or bilingual Spanish speakers; roughly 50 percent identified as
21 immigrants; and 16 percent were from rural communities. The care summit specifically
22 focused on engaging and mobilizing members around access to early education and childcare,
23 guaranteed income, access to mental healthcare, and revenue dedicated to early learning and
24 childcare services.

1 17. Additionally, FFO organizes a statewide parent cohort comprised of five
 2 parents from communities most impacted by the childcare crisis in Oregon, including women
 3 of color, parents with disabilities, parents of children with disabilities, and low-income parents.

4 18. Immigrant parents and caregivers, as well as their children and families, are a
 5 central part of FFO's membership and to our mission of ensuring that all low-income children
 6 and families in Oregon have access to high-quality and affordable early education and
 7 childcare, including through Head Start.

8 **II. The Importance of Head Start for Family Forward Oregon's Members Who Are
 9 Immigrants and/or Have Mixed-Status Families**

10 19. The Head Start program is critical for low-income children and their families
 11 in Oregon, and especially for FFO's members who are immigrants and/or have children and
 12 family members who are immigrants.

13 20. According to Upwardly Global,³ immigrant women and families face unique
 14 and heightened barriers to accessing early education and care programs due to the more limited
 15 availability of culturally responsive options, such as programs that provide dual-language
 16 learning and other linguistically appropriate and accessible programs.

17 21. Because of this gap in early education programs for immigrant families, Head
 18 Start—and its commitment to providing linguistically and culturally appropriate services—is
 19 especially vital to our immigrant members. For example, Head Start programs help to ensure
 20 that our immigrant members with limited English proficiency can participate fully in their
 21 children's early education and learning, communicate with providers regarding any issues or
 22 concerns, and ensure that their children are in a safe and supportive environment.

23 22. In addition, access to Head Start is critically important to our members due to
 24 the increased financial barriers that immigrant parents and families face in accessing early

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 27 ³ Upwardly Global, *How to Advance Immigrant Women's Access to Childcare: Policy Brief*, Feb. 15, 2024,
<https://www.upwardlyglobal.org/news/news/how-to-advance-immigrant-womens-access-to-childcare-policy-brief/>.

1 education and childcare programs. According to the Immigration Research Initiative, 33
 2 percent of immigrant workers make under two thirds of the median wage, as compared to 24
 3 percent of U.S.-born workers.⁴ As a result of these economic disparities and the staggering
 4 costs of childcare in Oregon, Head Start provides one of the only affordable early education
 5 and childcare options for our immigrant members.

6 23. In addition to ensuring that children can grow and thrive in supportive early
 7 education settings, access to Head Start enables many of our parent and caregiver members—
 8 and especially immigrant parents and caregivers—to work, attend school, enroll in vocational
 9 training programs, go to health and medical appointments and treatment, and otherwise provide
 10 for their families.

11 24. Based on my personal knowledge and experience working with Head Start
 12 agencies, community partners, and FFO members, it is my understanding that Head Start
 13 agencies have never asked about or screened for eligibility based on immigration status when
 14 enrolling children in their programs. I am not aware of any Head Start program denying
 15 enrollment to a child based on the immigration status of their parents, caregivers, or family
 16 members.

17 25. When FFO staff speak with members about Head Start and other early
 18 education and childcare options (whether during trainings or during one-on-one meetings),
 19 they are regularly asked by members about how immigration status affects a member's ability
 20 to enroll in the program. In fact, it is one of the most common questions that we receive from
 21 our members when discussing early education and childcare options.

22 26. FFO's members who are immigrants and/or have mixed-status households have
 23 expressed concerns that programs that screen for or collect information about immigration
 24 status may later share that information with law enforcement agencies or take other action that

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 27 ⁴ Immigration Research Council, *Immigrants in the Oregon Economy: Overcoming Hurdles, Yet Still Facing Barriers*, May 1, 2024, <https://www.ocpp.org/2024/05/01/immigrants-boost-oregon-economy/>.

1 may put them, their children, and/or their families at risk for increased scrutiny related to their
2 immigration status or other negative consequences.

3 27. FFO staff have relied on Head Start's policy not to screen based on immigration
4 status when discussing and sharing information about Head Start and other early education and
5 childcare programs with FFO members.

6 28. Based on Head Start's policy not to screen based on immigration status, FFO's
7 members have enrolled their children in Head Start, and have trusted Head Start programs to
8 be safe and supportive learning environments for their children. Also, because of this policy,
9 Head Start agencies have been able to build trust with and effectively engage in outreach with
10 FFO parent and caregiver members and the broader community.

11 **III. Defendants' Attacks on Head Start and Resulting Harms to Family Forward
12 Oregon and Its Members**

13 **a. Defendants' Attacks on Head Start**

14 29. I am aware that on July 14, 2025, the U.S. Department of Health and Human
15 Services ("HHS") issued a notice entitled "Personal Responsibility and Work Opportunity
16 Reconciliation Act of 1996 (PRWORA); Interpretation of 'Federal Public Benefit'" ("July 14
17 Immigrant Exclusion Directive"). I understand that this Immigrant Exclusion Directive went
18 into effect on July 14, 2025.

19 30. I understand that the Immigrant Exclusion Directive redefines Head Start as a
20 "federal public benefit" under the PRWORA and excludes certain immigrants from Head Start
21 based on immigration status.

22 31. I understand that only immigrants with specific legally defined immigration
23 statuses are "qualified" to receive federal public benefits under federal law.

24 32. However, I understand that various aspects of the Immigrant Exclusion
25 Directive leave many unanswered questions. For example, it does not specify whether
26 eligibility for Head Start will be determined based on the immigration status of the child, the
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1 parents and/or guardians, or family and/or household members, or provide clear guidance on
2 how Head Start programs should implement this new Directive.

3 **b. Harms for Family Forward Oregon's Parent and Caregiver Members**

4 33. Because of the new Immigrant Exclusion Directive, many Oregon parents and
5 caregivers, including FFO's members, may lose access to the Head Start programs on which
6 they rely for early childhood education solely based on immigration status.

7 34. In addition, because of the new Immigrant Exclusion Directive, many of FFO's
8 parent and caregiver members will be scared to attend, participate in, or enroll in Head Start
9 programs out of fear and confusion about the Rule and its impacts for themselves, their
10 children, and their families.

11 35. Many immigrant parents and caregivers do not know or are unsure about their
12 immigration status or the immigration status of their children and/or family members, as
13 defined under federal law. Many of our parent and caregiver members also are not familiar
14 with the PRWORA or federal immigration law. Because of this, many of our members do not
15 know or are unsure about which specific immigration statuses qualify them as "eligible" for
16 federal public benefits under federal law.

17 36. Because of the new Immigrant Exclusion Directive, many of our parent and
18 caregiver members will be forced to stop attending or to not enroll their otherwise-eligible
19 children in Head Start programs out of fear that they and their family members will be
20 subjected to greater scrutiny and monitoring based on immigration status, that their information
21 will be shared with law enforcement and immigration enforcement agencies, that participation
22 may deem them a "public charge" or otherwise negatively impact their or their family
23 members' immigration status, or that they could face civil and criminal penalties.

24 37. Losing access to Head Start means that many young children will experience
25 sudden and major disruptions to their early childhood education and learning, as well as the
26 loss of a safe and stable environment to learn, grow, and develop. These disruptions will have
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1 devastating effects on young children's development, mental and physical health, self-esteem,
2 sense of stability, and overall well-being. This is especially true for children with disabilities
3 and who are experiencing developmental delays, who rely on Head Start programs for
4 additional supports and interventions.

5 38. Without access to Head Start, many of these children and their families also will
6 lose access to affordable childcare options. As a result, many of our members will be forced to
7 miss work, lose their jobs, disenroll from school or vocational training programs, and otherwise
8 be unable to provide for and take care of themselves and their families. Loss of childcare access
9 may have further impacts on our members' ability to pay their rent, utility bills, grocery bills,
10 and other expenses, and could lead to housing insecurity and homelessness for many members.
11 It will also mean that our members will face increased barriers to getting to medical and
12 healthcare appointments and otherwise accessing medical treatment due to lack of childcare.

13 39. Head Start also encourages our parent and caregiver members to take an active
14 role in their children's education and development through various parent involvement
15 opportunities, such as volunteering in the classroom, attending parent-teacher conferences, and
16 participating in decision-making. Head Start also provides parent education and training
17 opportunities, helping our members to develop important parenting, education, and job
18 readiness skills and to improve their economic, physical and psychological well-being and self-
19 sufficiency. Exclusion from Head Start will mean that these opportunities will no longer be
20 available to our immigrant members and could negatively impact parent-child relationships.

21 **c. Harms to Family Forward Oregon Based on the Immigrant Exclusion
22 Directive**

23 40. In addition to the harms on our parent and caregiver members, the new
24 Immigrant Exclusion Directive will directly harm FFO by frustrating our mission to advance
25 access to early education and childcare for low-income children and families in Oregon,
26 diverting our limited staff time and resources from existing and pre-planned core activities
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1 toward rapid response efforts, and interfering with our ability to carry out our existing work
2 and activities.

3 41. The Head Start program is a vital component of FFO's mission and efforts to
4 promote economic inclusion and secure broader access to high-quality, equitable, and
5 culturally relevant early childhood education, learning, and childcare for mothers and families
6 in Oregon, and especially for our members who are immigrants and/or have children and
7 family members who are immigrants. The exclusion of immigrant children and families from
8 Head Start caused by the new Directive will not only harm these members, but also directly
9 undermine our mission and ongoing efforts to increase access to early childhood education and
10 childcare across the state. It also will perpetuate the undervaluing of care and caregivers,
11 exacerbate the existing early education and childcare crisis, and further entrench systemic
12 disparities in health, educational, and economic outcomes for immigrant children and
13 families—all of which are conditions that are central to FFO's mission.

14 42. The exclusion of immigrant children and families from Head Start will also
15 directly harm and interfere with FFO's planned activities to organize and empower parent and
16 caregiver members through monthly membership meetings, direct actions, summits, cohorts,
17 and other events. Because many of our immigrant members rely on Head Start for childcare,
18 losing access to Head Start will limit those members' ability to attend, participate in, or
19 otherwise engage in our programs and activities—thereby directly interfering with our ability
20 to conduct our work.

21 43. The Immigrant Exclusion Directive also will force FFO to divert its already-
22 limited staff and organizational resources from existing work and activities toward rapid
23 response efforts and increased inquiries related to the Directive and its impacts on our
24 members. For example, our staff will be forced to dedicate significant time and resources to
25 responding to concerns and questions from FFO parent and caregiver members, FFO childcare
26 provider members, community partners, and other stakeholders regarding the Immigrant
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1 Exclusion Directive. This is especially true for our Bilingual State Organizer, who serves as
2 our primary liaison with Spanish-speaking and immigrant members, and who will be forced to
3 divert her time away from pre-planned work toward responding to inquiries and otherwise
4 supporting our members in understanding the Immigrant Exclusion Directive.

5 44. Since the Department of Health and Human Services announced its intention to
6 issue the Immigrant Exclusion Rule on July 10, 2025, FFO has experienced an increase in
7 outreach and inquiries from parent and caregiver members, caregiver members, community
8 partners, and other stakeholders about the Directive and its impacts. In fact, our staff have
9 already spent significant time responding to inquiries about the Directive, diverting time and
10 resources away from previously scheduled activities.

11 45. In addition to forcing our staff to divert resources from existing work, the
12 Immigrant Exclusion Directive will force FFO to expend additional resources on translation
13 services to put together and distribute information and materials about the Directive and its
14 impacts in multiple languages so that they are accessible to our members who are immigrants
15 and/or have mixed-status households.

16 46. Moreover, FFO will be forced to divert its limited resources away from its core
17 and pre-planned operating activities toward addressing the immediate harms of Defendants'
18 actions on its members. For example, FFO will be forced to expend its limited financial
19 resources on covering costly childcare services so that its immigrant parent and caregiver
20 members can continue to attend and participate in FFO meetings, events, and activities. FFO
21 also will be forced to expend additional staff time and resources organizing trainings, meetings,
22 and other actions to educate our members about and otherwise respond to the Directive and its
23 impacts.

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 21, 2025

/s/ Candice Williams

Candice Williams